

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MATTHEW KEIL, JOHN DE LUCA, SASHA	:	
DELGADO, DENNIS STRK and SARAH BUZAGLO,	:	
	:	
Plaintiffs,	:	Case No. <u>1:21-cv-08773</u>
	:	
- against -	:	
	:	
THE CITY OF NEW YORK; BOARD OF EDUCATION	:	
OF THE CITY SCHOOL DISTRICT OF NEW YORK;	:	
DAVID CHOKSHI, IN HIS OFFICIAL CAPACITY OF	:	
HEALTH COMMISSIONER OF THE CITY OF NEW	:	
YORK; and MEISHA PORTER, IN HER OFFICIAL	:	
CAPACITY AS CHANCELLOR OF THE NEW YORK	:	
CITY DEPARTMENT OF EDUCATION,	:	
	:	
Defendants.	:	
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	:	
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**DECLARATION OF AGELIKI HELIOTIS**

Ageliki Heliotis declares as follows, pursuant to 28 U.S.C. § 1746:

1. My name is Ageliki Heliotis and I have been employed by the New York City Department of Education (“DOE”) as a teacher since 1999.
2. I respectfully submit this Declaration in support of Plaintiffs’ Motion for a Preliminary Injunction and Application for a Temporary Restraining Order filed October 26, 2021.
3. I know the facts stated herein to be true based upon my personal knowledge, except for those statements which are made on information and belief, and as to those, I verily believe them.
4. I am a member of the Orthodox Christian church and have a sincerely held religious belief that I should not receive any of the Covid-19 vaccines.

5. My religion is extremely important to me and is an integral part of my life. I regularly attend services, participate in the holy sacraments, go on religious pilgrimages, and continuously listen to and study many homilies about my faith. Prayer, study, and fasting are constants in my life and bring me closer to God.
6. I have always been a firm believer that we should keep our body pure and healthy because it is the vessel of the Holy Spirit. Therefore, I chose not to be subjected to such medical and spiritual risks of taking the vaccine.
7. I hold a strong belief that abortion is a cardinal sin, and I cannot find any justification for it either even if someone else may benefit. Due to the aborted fetal cell lines used to either test or manufacture the vaccines, I believe taking the vaccine would mean I am participating in the cardinal sin of abortion. Receiving the vaccines is a contradiction to my sincerely held religious belief even if the vaccine would benefit me.
8. On September 15, 2021, I submitted my request for a religious exemption to the DOE.
9. A true and correct copy of the documentation I submitted is attached as Exhibit A.
10. On September 17, 2021, the DOE denied my application.
11. A true and correct copy of that denial is attached as Exhibit B.
12. In its denial, the DOE stated, "This application was reviewed in accordance with applicable law as well as the Arbitration Award in the matter of your union and the Board of Education regarding the vaccine mandate."
13. On September 19, 2021, I submitted my appeal documentation, including a letter from my pastor Father Ephraim Poonen, a Priest-Monk who lives in Alaska.
14. I became acquainted with Father Ephraim while he lived in Arizona, where I would travel

annually to visit my spiritual father. I have continued to stay in contact with and seek the counsel of Father Ephraim and consider him my pastor. I do attend a local church, but am guided more by Father Ephraim.

15. On September 25, 2021, I attended the arbitration hearing on my appeal.

16. At the arbitration hearing, the representative from DOE stated that it was the DOE's position that because the leader of my religion approved the vaccine that I would be automatically denied. She also stated that my letter should have come from the pastor at the local church I attend and not a priest in Alaska.

17. At the arbitration hearing, the DOE representative became so hostile in attacking my religious beliefs that the UFT representative stepped in to remind her it was not a cross-examination.

18. On September 24, 2021, the Arbitrator denied my appeal, but incorrectly noted that I had requested a medical exemption.

19. A true and correct copy of this denial is attached as Exhibit C.

20. The DOE is now forcing me to decide by October 29, 2021, whether to be placed on unpaid leave with benefits for a limited time period (but only if I surrender my legal right to challenge the DOE's actions), to resign and retain my benefits for a limited time period (but only if I surrender my legal right to challenge the DOE's actions), or to lose my job and my health insurance.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
October 26, 2021

  
By: Ageliki Heliotis